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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

GILDA ROMAN-PADILLA, an individual,  
  
 Plaintiff,

Case No.: 2:16-cv-00671-GMN-PAL

vs.

MATTHEW VICKERS, an individual; DOES  
 I through X; and ROE Corporations I through  
 X, inclusive,  
  
 Defendants.

**STIPULATION AND ORDER TO  
 EXTEND PRE-TRIAL ORDER  
 DEADLINE (FOURTH REQUEST)**

Plaintiff GILDA ROMAN-PADILLA (“Plaintiff”) and Defendant MATTHEW  
 VICKERS (“Defendant”), by and through their undersigned counsel of record, hereby stipulate  
 to an extension of pre-trial order deadline, pursuant to LR 6-1 and LR 26-4. This is the parties’  
 fourth stipulation to extend time for pre-trial order deadlines. The current deadlines are:

- (1) Initial expert disclosures: CLOSED
- (2) Amending pleadings or adding parties: CLOSED
- (3) Rebuttal expert disclosures: CLOSED
- (4) Interim Status Report: CLOSED
- (5) Discovery cutoff: CLOSED
- (6) Dispositive motions: CLOSED
- (7) Pretrial order: Friday, December 8, 2017

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**I. DISCOVERY COMPLETED TO DATE**

- Plaintiff served her Fed. R. Civ. P. 26 initial disclosure of witnesses and documents, and served six supplements thereto.
- Defendant served his Fed. R. Civ. P. 26 initial disclosure of witnesses and documents, and served seven supplements thereto.
- Defendant served Plaintiff with written discovery requests, and Plaintiff has served responses and supplemental responses thereto.
- Plaintiff served Defendant with written discovery requests, and Defendant has responded thereto.
- The following depositions were taken:
  - Plaintiff;
  - Defendant;
  - Paiman Vickers (defendant's wife)
  - Officer John Richter (responding officer);
  - Robert Aarts (eye-witness);
  - Marshall Anthony, DO;
  - Christopher Fisher, MD;
  - Jaswinder Grover, MD;
  - Thomas Carroll, PhD;
- Plaintiff underwent a Fed. R. Civ. P. 35 medical examination with Defendant's retained medical expert.
- Plaintiff served her initial expert disclosure.
- Defendant served his initial expert disclosure.
- Defendant served his rebuttal expert disclosure.
- Numerous subpoenas were served on Plaintiff's healthcare providers pursuant to obtaining Plaintiff's prior and updated treatment records.
- Participated in the Mandatory Settlement Conference on November 9, 2017.

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**II. DISCOVERY YET TO BE COMPLETED**

- Parties are still awaiting a decision and/or for the Court to set a hearing (based on Defendant's request for the same) on Plaintiff's Motion to Strike Defendant's Third Supplemental Expert Witness Disclosure. (ECF No. 35). Additional expert discovery may ensue following and/or based on the Court's ruling on the same.

**III. GOOD CAUSE NECESSITATING EXTENSION**

Party counsel, in order to accommodate mutual scheduling conflicts (including personal health events), hereby agree and respectfully request that the deadline for filing the Joint Pretrial Order be extended from December 8, 2017 to December 29, 2017. The parties submit that this brief extension of time will have no material impact on this litigation, and is sought by party counsel in good faith and for legitimate purpose.

**IV. PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY**

The parties hereby submit the following proposed schedule for completing all remaining discovery:

- (1) Initial expert disclosures: CLOSED
- (2) Amending pleadings or adding parties: CLOSED
- (3) Rebuttal expert disclosures: CLOSED
- (4) Interim Status Report: CLOSED
- (5) Discovery cutoff: CLOSED
- (6) Dispositive motions: CLOSED
- (7) Pretrial order: **Friday, December 29, 2017**

DATED this 7<sup>th</sup> day of December, 2017.

**LADAH LAW FIRM**

*/s/ Joseph C. Chu, Esq.*

**JOSEPH C. CHU**

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*Attorneys for Plaintiff Gilda Roman-Padilla*

DATED this 7<sup>th</sup> day of December, 2017

**GORDON & REES LLP**

*/s/ Liane S. Binowitz, Esq.*

**LIANE S. BINOWITZ**

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*Attorneys for Defendant Matthew Vickers*



**ORDER**

Based upon the foregoing Stipulation to Extend Pre-Trial Order Deadline:

1. The deadline for filing the pretrial order shall be extended to ~~Friday, December 29, 2017~~ 30 days after the court's order on the pending motion to strike (ECF No. 45).
2. All other discovery and pre-trial deadlines shall remain unchanged.

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: December 11, 2017